

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

HACHETTE BOOK GROUP, INC.,  
HARPERCOLLINS PUBLISHERS LLC,  
JOHN WILEY & SONS, INC., and  
PENGUIN RANDOM HOUSE LLC

Plaintiffs,

v.

INTERNET ARCHIVE and DOES 1 through  
5, inclusive

Defendants.

Case No. 1:20-CV-04160-JGK

**DECLARATION OF IMKE REIMERS, PH.D.**

I, Imke Reimers, Ph.D., declare as follows:

1. I am a tenured Associate Professor of Economics at Northeastern University specializing in industrial economics with a focus on digital markets and intellectual property. My qualifications are described in Paragraphs 1-3 of my Opening Expert Report and the CV attached thereto as Exhibit A.

2. I was engaged by the Internet Archive, the Defendant in this lawsuit, to serve as an expert in this case. I submit this declaration based on my personal knowledge and in support of the Internet Archive's motion for summary judgment. If called upon as a witness, I could and would completely testify to the truth of each statement herein.

3. Attached hereto as **Exhibit 1** is a true and correct copy of my Opening Expert Report, served February 25, 2022, and excerpts of its exhibits. That document contains a true, correct, and accurate statement of opinions I have formed in this matter, and the basis for those opinions.

4. Attached hereto as **Exhibit 2** is a true and correct copy of my Rebuttal Expert Report, served May 27, 2022, and excerpts of its exhibits. That document contains a true, correct, and accurate statement of opinions I have formed in this matter, and the basis for those opinions.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on 7/6/2022 in Mannheim, Germany.

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*Imke Reimers, Ph.D.*

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IMKE REIMERS, PH.D.

**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2022 the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing to the attorneys of record in this case.

/s/ Joseph C. Gratz  
JOSEPH C. GRATZ